

Distribution

K. G. Akins

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VI HEALTH, SAFETY, AND ENVIRONMENT COMMITTEE MEETING HIGHLIGHTS

January 25, 1994 Atlanta, GA

Companies represented: Vista, Borden, Dow, Oxy, Geon,
Georgia Gulf, PPG

Ron McCreedy with Dow gave an update on a study undertaken by Dow to publish a new unit risk factor for VCM. The report should be published this summer. The unit risk factor is used in risk assessments to determine what an individual's risk of getting cancer from a given fence-line concentration of VCM is. This new risk factor is important in the light of Mississippi's proposed air toxics review process that requires a risk assessment calculation for any project increasing VCM emissions. Dave Penney (Vista R&D) has a copy of the draft of the report.

Don Goodman with Oxy gave an update on a study Oxy is considering. Oxy is considering measuring emissions from flexible PVC processors to refute present data used by EPA (University of Lowell study). Oxy is concerned that these estimates are too high and could lead to processors paying excessive Clean Air Act fees.

Geon has been considering for some time listing PVC on SARA 311/312 reports as a hazardous material. This is based on the fact that they believe the PVC dust is an inhalation hazard. Based on the strong comments from the rest of the group, it is apparent that Geon is alone in this interpretation. Geon agreed to give the group some more details on the thought process behind this decision to help the group understand their position.

A roundtable discussion on release reporting practices in the industry was informative. All companies, with the exception of PPG, report only "releases" (as defined by NESHAPs) to the National Response Center (NRC). Leaks are generally not reported. Oxy said that they believe you must have some leak provisions in your state permit to be

able to not report leaks. Most all companies err on the conservative side when calling in release estimates to the VI SHE COMMITTEE MEETING - cont.

NRC. Also, all other companies said that this decision on leak vs. release and calculation of release estimates is delegated to the shift supervisors. Many companies said they would call back the NRC to amend earlier, conservative estimates in a few days when events and circumstances were more clear.

I told the group that EPA Region IV had told me that the number of calls to the NRC was a big criteria for prompting audits of your facility. I also told them that as far as we knew, calls to amend earlier reports were counted the same as new reports. This raised a few eyebrows. I told the group that the Aberdeen Plant had a communication plan in place that allowed the shift supervisor or his designee to relay the information to me. The decision on whether to call the NRC was then to be made by me.

Everyone appeared to calculate release or leak quantities in pretty much the same way. Most people had tables set up based on orifice size and pressures to calculate quantities quickly. I asked the group how they interpreted "immediate" in the context of release reporting. Oxy said that they interpret that to mean 30 minutes. The rest of the group agreed. I relayed that Region IV told us we are subject to fines after 15 minutes.

There was a small discussion on medical surveillance of employees. Vista appeared to be on the high end of the amount surveillance done.

Other Vista employees on VI committees presently include: Mark Schneider (VI Executive Board), Paul Carrico (Issues Management), Dave Penney and Joe Ledvina (various ad hoc committees).

The next committee meeting will be held May 25th in Dallas.

K. G. Akins
Senior Environmental Coordinator

CC: CWT, SJV, JEN, JDO
Houston: JCL